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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF DELAWARE  
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4 SRI INTERNATIONAL, INC., a  
California Corporation,

5  
Plaintiff,

6  
vs. Case No. 04-1199-SLR

7  
INTERNET SECURITY SYSTEMS,  
8 INC., a Delaware  
corporation, INTERNET  
9 SECURITY SYSTEMS, INC., a  
Georgia corporation, and  
10 SYMANTEC CORPORATION, a  
Delaware corporation,

11  
Defendants.

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13  
14 Deposition of  
15 FREDERICK M. AVOLIO  
16 May 18, 2006  
17

18  
19  
20 Reported by  
John Wissenbach, CSR 6862

21  
22 SHARI MOSS & ASSOCIATES  
Certified Shorthand Reporters  
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1 Q. And "application gateway" is another term  
2 that you use to refer to something that's referred  
3 to by others as a proxy server?

4 A. That's correct.

5 Q. Okay. So a proxy server would be another  
6 type of firewall, distinct from a packet filter?

7 A. Yes, in -- in firewalling terms. There  
8 are -- I mean, there may be other uses of the term.  
9 But in computer and network security, application  
10 gateway is a mechanism for firewalling, one could  
11 say a type of firewall, also called a proxy firewall  
12 or employing proxy servers.

13 Q. So that -- and then there was a third type  
14 that you mention here: hybrids. Those would be  
15 firewalls that implement some combination of packet  
16 filtering and proxy servers?

17 A. That's correct.

18 Q. So would you agree, then, as of November  
19 1998, at least, that not all firewalls were  
20 proxy-based firewalls?

21 A. That's correct.

22 Q. And would you also agree that as of  
23 November 1998, not all, quote-unquote, proxy servers  
24 were firewalls?

25 A. That's correct.

1 CERTIFICATE OF REPORTER

2 I, JOHN WISSENBACH, a Certified Shorthand  
3 Reporter, hereby certify that the witness in the  
4 foregoing deposition was by me duly sworn to tell  
5 the truth, the whole truth, and nothing but the  
6 truth in the within-entitled cause;

7 That said deposition was taken down in  
8 shorthand by me, a disinterested person, at the time  
9 and place therein stated, and that the testimony of  
10 the said witness was thereafter reduced to  
11 typewriting, by computer, under my direction and  
12 supervision;

13 That before completion of the deposition,  
14 review of the transcript [ ] was [X] was not  
15 requested. If requested, any changes made by the  
16 deponent (and provided to the reporter) during the  
17 period allowed are appended hereto.

18 I further certify that I am not of counsel  
19 or attorney for either or any of the parties to the  
20 said deposition, nor in any way interested in the  
21 event of this cause, and that I am not related to  
22 any of the parties thereto.

23 DATED:

24

25 JOHN WISSENBACH, CSR No. 6862